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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

XINYUAN CHONG, *et al.*,

Plaintiffs,

v.

PAMELA BONDI¹, Attorney General, United
States Department of Justice, *et al.*

Defendants.

C 5:24-cv-08741-SVK

**STIPULATION TO STAY PROCEEDINGS;
~~[PROPOSED]~~ ORDER**

The parties, through their undersigned attorneys, hereby stipulate and respectfully request the Court to stay proceedings in this case for a limited time, until August 14, 2025. The parties make this joint request because they are pursuing an administrative resolution that may render further litigation of this case unnecessary.

Plaintiffs filed this action seeking adjudication of their Form I-485, Application to Register Permanent Residence or Adjust Status. On April 4, 2025, United States Citizenship and Immigration Services (“USCIS”) issued a Request for Evidence (“RFE”) on Plaintiffs’ application. Once USCIS receives Plaintiffs’ response to the RFE, the agency will work diligently towards completing

¹ Pamela Bondi is automatically substituted as the defendant in this matter in accordance with Federal Rule of Civil Procedure 25(d).

1 adjudication of Plaintiffs' application, absent unforeseen or exceptional circumstances that would
2 require additional time for adjudication.

3 Accordingly, the parties stipulate and request that the proceedings in this case be stayed until
4 August 14, 2025, at which time the parties will file a joint status report with the Court. At that time, the
5 parties may request a further continuance of the stay of proceedings, dismissal of the litigation if
6 appropriate, or placement of the case back on the Court's active docket. A stay of proceedings in this
7 case will benefit the parties and conserve the Court's resources while the parties pursue a potential
8 administrative resolution.

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10 Dated: April 7, 2025

Respectfully submitted²,

11 PATRICK D. ROBBINS
12 Acting United States Attorney

13 s/ Elizabeth D. Kurlan
14 ELIZABETH D. KURLAN
15 Assistant United States Attorney
16 Attorneys for Defendants
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28 ² In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed below concur in the filing of this document.

1 Dated: April 7, 2025

2 /s/ Xinyuan Chong
3 XINYUAN CHONG
4 Pro Se Plaintiff

5 /s/ Chao Pan
6 CHAO PAN
7 Pro Se Plaintiff

8 ~~[PROPOSED]~~ ORDER

9 Pursuant to stipulation, the case is hereby **STAYED** until August 14, 2025, at which time
10 the Parties shall file a joint status report with the Court.

11 **SO ORDERED.**

12 Date: April 8, 2025

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14 HON. SUSAN VAN KEULEN
15 United States Magistrate Judge
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